

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE PROIMMUNE COMPANY, LLC,
derivatively and on behalf of INNATE
FFAAP MEDICINE LLC and STRESS
WATCHERS OXIDATIVE STRESS TEST
METHOD LLC, and INNATE FFAAP
MEDICINE LLC, derivatively on behalf of
PROTHIONE LLE and LIPINOL LLC,

Plaintiffs,

v.

LAURA LILE, M.D., and THREE AMINOS,
LLC,

Defendants.

AND RELATED COUNTERCLAIMS AND
THIRD-PARTY CLAIMS.

Hon. Kenneth M. Karas

Case No. 7:22-cv-08229-~~UA~~ (Kmk)

**STIPULATION RE: RESPONSIVE
PLEADINGS**

WHEREAS, on August 25, 2022, Plaintiff The ProImmune Company, LLC, derivatively and on behalf of INNATE FFAAP MEDICINE LLC and STRESS WATCHERS OXIDATIVE STRESS TEST METHOD LLC, and INNATE FFAAP MEDICINE LLC, derivatively on behalf of PROTHIONE LLE and LIPINOL LLC, (“ProImmune”) filed its complaint in this action in the Supreme Court of New York, New York County, Case No. 653093/2022;

WHEREAS, on September 26, 2022, Defendants, Counterclaimants, and Third-Party Plaintiffs Laura Lile, M.D. and Three Aminos, LLC (collectively the “Three Aminos Parties”) removed this action to this Court;

WHEREAS, on September 26, 2022, the Three Aminos Parties filed counterclaims against ProImmune and third-party claims against Third-Party Defendant Albert Crum, M.D. (“Dr. Crum,” and with ProImmune, the “ProImmune Parties”; the counterclaim and third-party claims collectively referred to as the “Counterclaims”);

WHEREAS, ProImmune’s response to the Counterclaims is currently due on October 17, 2022;

WHEREAS, on October 6, 2022, counsel for the Three Aminos Parties requested that counsel for Dr. Crum accept service on his behalf and execute a waiver of service for the Counterclaims, and counsel agreed to do so;

WHEREAS, under the current deadlines, Dr. Crum’s response to the Counterclaims is due on December 5, 2022;

WHEREAS, the parties wish to consolidate the ProImmune Parties’ deadline to respond to the Counterclaims to December 5, 2022, as the ProImmune Parties anticipate filing one consolidated response on behalf of all ProImmune Parties;

WHEREAS, the parties agree to extend ProImmune's deadline to respond to the Counterclaims to December 5, 2022;

SO STIPULATED.

Dated: October 12, 2022
Los Angeles, California

BROWN NERI SMITH & KHAN, LLP

By: /s/ Ryan B. Abbott
Ryan B. Abbott

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*Attorneys for Plaintiffs/Counterclaim
Defendants,
The ProImmune Company, LLC and Albert
Crum, M.D.*

Dated: October 12, 2022
New York, New York

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By: /s/ Frank T. Spano
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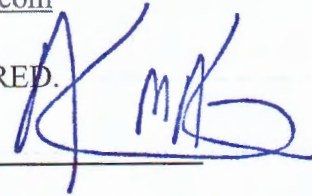
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SO ORDERED.

A handwritten signature in blue ink, appearing to read 'KMK', is written over a horizontal line.

HON. KENNETH M. KARAS
United States Judge

10/12/2022